

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**In Re: Nathan Craig Brewer and
Chancie Diane Brewer,
Debtors** § **Cause No. 11-51579-KMS**
§ **CHAPTER 13**

**MOTION TO AVOID NON-POSSESSORY, NON-PURCHASE-MONEY
SECURITY INTEREST AND FOR OTHER RELIEF**

COMES NOW **William Raymond Bullock**, the Debtor in the above-styled cause, and moves the Court for an order avoiding a Creditor's non-possessory, non-purchase money security interest in certain of the Debtor's household goods, household furnishings and other items and categories of items as set forth in 11 U.S.C. 522 (f)(1)(B). For cause and in support of this motion Debtor would show unto the Court as follows:

1. The Debtors commenced this case on **July 11th, 2011** by filing a petition for relief under Chapter 13 of Title 11, United States Code.
2. The Debtors borrowed money from **Eagle Financial** (hereinafter referred to as the “Creditor”) and as security for said loan, the Creditor insisted upon and the Debtor executed a security interest in and on the Debtor's personal property which consisted entirely of household furnishings and personal possessions which were held primarily for the family household use of the Debtors.
3. All such possessions of the Debtor's should be exempt pursuant to Miss. Code Ann. § 85-3-1 et seq. and other applicable laws.
4. The money borrowed from the Creditor does not represent any part of a purchase money security lien for any of the articles covered in the security agreement executed by the Debtors, and all of the articles remain in the possession of the Debtors.

5. The existence of the Creditor's lien on the Debtors' household and personal goods impairs an exemption to which the Debtors would be entitled under Miss. Code Ann. §85-3-1 et seq.; 11 U.S.C. 522(f)(2) and Owen v. Owen 111 S. Ct 1833 (1991).

WHEREFORE, the Debtors pray that an Order will be entered avoiding the security interest in the Debtors' personal and household goods and for such other, different or additional relief as may be just and proper.

Respectfully Submitted this the 7th day of August, 2011.

**William Raymond Bullock,
DEBTOR**

BY: /s/ Paul B. Caston
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